

MEMO ENDORSED**SPIVAKLIPTON**LLP

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March 20, 2023

Via ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007

Re: **United Scenic Artists, Local USA 829, IATSE v.
Paradise Square Broadway Limited Partnership and Bernard Abrams
Case No. 1:22-cv-05704 (VEC)**

Dear Judge Caproni:

This firm represents Plaintiff in the above-referenced case. Pursuant to Rule 2.C of Your Honor's Individual Practices in Civil Cases, I write to request a two-week extension of each of the briefing deadlines in the Court's Order dated February 16, 2023, (ECF No. 50), such that the new briefing schedule will be as follows:

<u>Filing</u>	<u>Current due date</u>	<u>Requested due date</u>
Plaintiff's motion to confirm the arbitration award	March 24, 2023	April 7, 2023
Defendants' response and motion to vacate the award	April 21, 2023	May 5, 2023
Plaintiff's reply in support of its motion and opposition to Defendants' motion	May 5, 2023	May 19, 2023
Defendants' reply in support of their motion	May 19, 2023	June 2, 2023

Plaintiff requests these extensions because the parties have made significant progress toward settlement and are hopeful that this matter can be resolved without further litigation. This is the first request for an extension of the above deadlines, and Defendants' counsel consents to this request.

Respectfully submitted,

SPIVAK LIPTON LLP



Nicholas J. Johnson
Counsel for Plaintiff

Application GRANTED. The deadline for Plaintiff's motion to confirm the arbitration award is hereby extended from March 24, 2023 until **April 7, 2023**. The deadline for Defendants' response and motion to vacate the award is extended from April 21, 2023 until **May 5, 2023**. The deadline for Plaintiff's reply is extended from May 5, 2023 until **May 19, 2023**. The deadline for Defendants' reply is extended from May 19, 2023 until **June 2, 2023**.

SO ORDERED.

 03/20/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE